

0033126

CORRES. CONTROL
OUTGOING LTR. NO.Rocky Flats Plant
North American Space Operations
Rockwell International Corporation
P.O. Box 464
Golden, Colorado 80402-0464
(303) 966-7000Rockwell
International

BEST AVAILABLE COPY



000025643

88 RF 1936

Contractor to U.S. Department of Energy

January 17, 1988

88-RF-1936

Albert E. Whiteman
Area Manager
DOE, RFAOAttention: J. Garcia, C.C. Jierree, R.D. Reed, K.J. Schneider, N.D.
McGuire

MEETING WITH ON NPDES PERMIT VIOLATIONS

Attached is a summary prepared by the HS&E Environmental Management section of the June 15 meeting that was held with EPA and the City of Broomfield to discuss the recent National Pollutant Discharge Elimination System (NPDES) permit violations. If you have any questions or comments on this summary, please call Nancy M. Daugherty, X7005.

G.W. Campbell, Asst. Director
Health, Safety and EnvironmentOrig. and 5 cc - A.E. Whiteman
Enc.

DIST.	LTR	ENCL
SANCHINI, D. J.		
BADER, C. P.		
CAMPBELL, G. W.	X	X
HOOD, R. C.		
KINZER, J. E.		
KIRBY, W. A.		
McNETT, J. F.		
MEYERS, G. W.		
ROECKER, J. H.		
SHANNON, W. M.		
SMITH, R. E.		
WEIDNER, C. W.		
WESTON, W. F.		
WOZNAK, B. D.		
YOUNG, E. R.		
BETCHER, D. H.		
CARNIVAL, G. J.		
HARMAN, L. K.		
HEBERT, J. L.		
HOEY, J. B.		
HOFFMAN, R. B.		
KLAMANN, R. L.		
KRIEG, D. M.		
LIM, B. W.		
LOUDENBURG, G. E.		
NAIMON, E. R.		
NEWBY, R. L.		
TURNER, H. L.		
VELASQUEZ, R. N.		
CORRES. CONTROL	X	X
W. H. Elliott	X	X
F. D. Hottel	X	X
F. L. Larson	X	X
G. R. Ruel	X	X
G. H. Schaefer	X	X
C. E. Sundblad	X	X
EMP	X	X
Nancy Daugherty	X	X
CLASSIFICATION		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTH. CLASSIFIER SIG

DATE

IN REPLY TO LTR. NO.

DEC.

LTR APPROVALS

ORIG & TYPIST INITIALS

229A/229A
RF-46469 (Rev. 2/88)

SW-A-002870

NPDES PERMIT VIOLATION MEETING

JUNE 15, 1988

BROOMFIELD CITY COUNCIL CHAMBERS

A meeting was held June 15, 1988, to discuss the status of investigations on and corrective actions for recent violations to the Plant EPA National Pollutant Discharge Elimination System (NPDES) permit. Those attending included the following:

Michael Reed	Environmental Protection Agency, Compliance
Kathy Kochevar Hallie Mahan	City of Broomfield, Water Treatment Facility
Niles McGuire Jody Garcia Kari Schneider	DOE-RFAO
Chuck Rose Bill Elliott	Rockwell Intl., Utilities
Nancy Daugherty Cindy Sundblad	Rockwell Intl., Environmental Mgmt.

Permit violations were reviewed, and current and future actions were discussed, as summarized below:

NPDES VIOLATIONS

February - BOD₅ (11.0 mg/l avg.; 10 mg/l limit)

March - BOD₅ (21.3 mg/l avg.; 10 mg/l limit)

April - BOD₅ (>27 mg/l avg.; 10 mg/l limit
>40 mg/l daily; 25 mg/l limit)

- Fecal coliform (312/100 ml; 200/100 ml limit)

May - BOD₅ (11 mg/l avg.; 10 mg/l limit)
(discharged 1 day due to 3-inch rain storm).

ACTIONS BEING TAKEN

- Spray irrigation when possible.
- In-house review of Sanitary Treatment Plant.
- Increased chlorine feed to control fecal coliform.
- Study of B-3 Pond by CSU biologist.
- QA study of BOD₅ analytical procedures.
- Consultation with outside sewage treatment expertise in review of Sanitary Treatment Plant operations.
- Initiation of carbonaceous biochemical oxygen demand (CBOD) analyses for comparison to BOD₅ results.
- Evaluation of possible alternatives for sewage disinfection.
- Evaluation of water conservation and recycle options.

The studies of Pond B-3, the Sewage Treatment Plant, and the analytical procedures will determine whether the violations are a result of natural conditions existing because of seasonal variations in Pond B-3, whether improvements are needed in RFP sewage treatment processing, or whether changes should be made in monitoring parameters, locations or procedures for demonstration of compliance with the permit.

Reed expressed satisfaction with the actions which are being undertaken, but voiced his concern over the apparent slow rate at which resolution of the problems was proceeding. He requested copies of Pond B-3 and Sewage Treatment Plant monitoring data for EPA. Garcia indicated that one cause of the apparent delay in resolving the problems was the lack of Plant precedent for the successive violations that have occurred. In the past, Pond B-3 discharges into Walnut Creek were much less frequent than this year, and little historical data exist for making seasonal water quality comparisons. The purpose of the studies currently underway is to acquire that data. Reductions in available spray irrigation area as a result of RCRA/CERCLA activities has necessitated increased discharge from Pond B-3.

Kochevar reported that Great Western Reservoir (GWR) has recently been reclassified as a warm water aquatic/recreational reservoir and this may have some impact on treatment options available for any water discharged to GWR. Water quality standards for the reservoir are more stringent under this classification than under its previous classification as a raw water supply only. Kochevar will provide a copy of the new GWR water quality criteria to RFP.

Reed indicated that some minor changes to the NPDES permit might be made without a public comment period, but that any major changes would require such a period. As examples, Reed indicated that the change from a BOD₅ monitoring parameter to CBOD likely would be considered a major change; a change in monitoring location from Pond B-3 to the Sewage Treatment Plant effluent likely would be considered minor.

Rockwell Intl. and RFAO personnel indicated that they would keep EPA and the City of Broomfield informed as investigation activities continued, and that Rocky Flats Plant appreciated the constructive comments and suggestions which they had made.

N.M. Daugherty

N.M. Daugherty
Environmental Management
June 15, 1988